



SOUTHEAST PENNSYLVANIA REGIONAL TASK FORCE

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October 18, 2010

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Requests for Waiver of Various Petitioners to Allow the
Establishment Of 700 MHz Interoperable Public Safety Wireless Broadband
Networks (PS Docket No. 06-229)

The Southeastern Pennsylvania Regional Task Force (SEPA RTF) submits these comments in response to the Commission's September 15, 2010 Public Notice (Notice) in the above proceeding. The Notice seeks comments on waiver petitions filed in this proceeding by SEPA RTF and other entities that seek to deploy public safety broadband networks in the 700 MHz public safety spectrum licensed to the Public Safety Spectrum Trust. Specifically, we address the Commission's question whether its grant of overlapping waiver requests by New York City and the State of New York, in the Commission's Order of May 12, 2010 (May Order), should be extended to new requests by overlapping jurisdictions. In addition to SEPA RTF, the Commonwealth of Pennsylvania and four Southeastern Pennsylvania counties – the counties of Chester, Bucks and Delaware and the City and County of Philadelphia, all members of SEPA RTF – have submitted waiver petitions in this proceeding, making the Commission's resolution of this question particularly relevant for SEPA RTF and these petitioners.

SEPA RTF strongly encourages the Commission to grant overlapping waivers for the Southeastern Pennsylvania petitioners, consistent with the May Order and subject to the conditions regarding coordination, with the state, with each other and with all jurisdictions in the region, that are provided in the May Order. SEPA RTF has initiated and will continue discussions with the four county petitioners in order to ensure that all deployments are coordinated and will result in fully interoperable systems for this region.

Because the county petitioners are active members of SEPA RTF, we are confident that all will work with SEPA RTF and each other to coordinate their 700 MHz deployments, both technically and operationally.

SEPA RTF is particularly concerned that interoperability throughout the region will be delayed, perhaps indefinitely, if Philadelphia and the other county petitioners are not permitted to proceed now with their deployments by receiving the waivers necessary to go forward. Many local jurisdictions comprise the region and our members, with very different funding capabilities and very different technical resources for 700 MHz implementations. The Commission has often stated, including in the May Order, its goal of expeditious deployment for interoperable public safety broadband wireless communications throughout the nation. SEPA RTF believes this goal will best be realized for Southeastern Pennsylvania if our county members that are ready to proceed are permitted by the Commission to do so now. We believe that Philadelphia's early deployment will facilitate and speed other deployments in the region because it will provide a paradigm and a knowledge base, operational as well as technical, that all our members can rely on to achieve the shared goal of interoperability as they roll out 700 MHz systems. For this reason, and based on Philadelphia's stated commitment to cooperate with SEPA RTF throughout its deployment, we support a waiver grant for Philadelphia.

SEPA RTF agrees with the Commonwealth of Pennsylvania, stated in its petition in this proceeding, and with the Commission in its May Order, that statewide coordination is essential to achieve statewide interoperability. Moreover, we believe such a proactive request and deployment of broadband by the City of Philadelphia, SEPA RTF and the Commonwealth is fully consistent with the objectives of President Obama's BTOP program. We therefore support the Commonwealth's position that the Commonwealth should be the entity responsible for coordinating 700 MHz deployments in Pennsylvania, and to that end, we are in discussions with the Commonwealth's Office of Administration, Public Safety Radio Services.

Thank you for the Commission's consideration of these comments.

Respectfully submitted,

Southeastern Pennsylvania Regional Task Force

By: 

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Chairman, SEPA RTF